

# Review Activity Comments on DoD Standardization Documents

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## PROBLEM STATEMENT

The IPT reviewed the as-is document coordination process in use today by various Preparing Activities, Custodians, and Review Activities as prescribed in DoD 4120.24-M, Defense Standardization Program (DSP) Policies and Procedures, March 2000.<sup>1</sup>

DoD 4120.24-M requires the Preparing Activity of a standardization document to circulate the draft document to all Custodians and Review Activities for review and comment (see Para. C.5.4.1.1). The Preparing Activity circulates the draft document concurrently to all Custodians and Review Activities at the time of draft release. Concurrent distribution means that all activities receive the document at approximately the same time. No cycle time is lost in a sequential distribution that would occur if the drafts were sent to the Custodians first, and who would, in turn, send the draft to the Review Activities. This means of concurrent distribution is satisfactory and should remain unchanged.

However, under current policy, comments on the draft from the Review Activities are returned to the Service/Agency Custodians (see Para. C.5.4.1.4) for marking as “essential” or “suggested” comments for resolution and consolidation. The Service/Agency Custodian must consolidate all Service comments and resolve any problems. Custodians then send the final Service comments to the Preparing Activity. The Custodian must inform the Review Activities of the disposition of their comments, as well as provide a copy of the final comments that were submitted to the Preparing Activity (see Para. C.5.4.1.3).

In practice, many Review Activities submit their comments directly to the Preparing Activity. The Preparing Activity considers the comments and begins the resolution process that involves, as a minimum, the Custodians. Based on the experience of our IPT members, this scenario, although not in strict compliance with current policy, has not caused significant problems or issues. For most commodity areas, the policy is non-controversial.

As an added consideration, many Preparing Activities have made a transition to electronic coordination and use the reduced, 45-day coordination cycle allowed in DoD 4120.24-M for electronic coordination (see Para. C.5.4.1.7). The reduced

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<sup>1</sup> Refer to Tab D1.01 for a complete review of the standardization document development and coordination business process.

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time does create a potential bottleneck in the current procedure that requires the Custodian to review and consolidate Service comments.

## RECOMMENDATIONS

The IPT recommends a policy change to DoD 4120.24-M that would allow Review Activities the flexibility to submit their comments directly to the Preparing Activity of the document with a copy to their Custodian. This allowance would be with the approval of the Custodian. The Preparing Activity would compile and consolidate all comments and begin the resolution process. In those cases in which there are differences in Review Activity positions within a given Service/Agency, the Preparing Activity would request that the Service/Agency Custodian adjudicate a Service position.

## POLICY CHANGES

To accomplish this end, the IPT recommends the following changes to DoD 4120.24-M, paragraphs C.5.4.1.3 and C.5.4.1.4:

Add the following note to paragraph C.5.4.1.3:

“NOTE: To facilitate the coordination process, the Custodian can authorize the Review Activities to submit their comments directly to the Preparing Activity. The Custodian will continue to adjudicate, as needed, a Service position for the Preparing Activity. Copies of any comments sent directly to the Preparing Activity shall be sent to the Custodian.”

Add the following note to paragraph C.5.4.1.4:

“NOTE: Review Activities may submit their comments directly to the Preparing Activity when authorized by the Custodian. A copy of these comments also shall be sent to the Custodian.”